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UNITED STATES DISTRICT COURT 6

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SAMSARA INVESTMENTS LLC SERIES 4,

Plaintiff,

vs.

THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT; ROE BUSINESS ENTITIES I through X, inclusive,

Defendants.

Case No. 2:24-cv-01859-JCM-EJY

STIPULATION AND ORDER TO AMEND COMPLAINT AND EXTEND DEADLINE FOR REPLY

(First Request)

Plaintiff, Samsara Investments LLC Series 4 ("Samsara") and Defendant, The Department of Housing and Urban Development ("HUD" or "Federal Defendant") (collectively the "Parties") hereby represents and stipulate to the following:

DISTRICT OF NEVADA

- 1. The Parties have reached an agreement in principle to settle this matter. As a part of this agreement, the Parties agree that Samsara shall be permitted to file an amended complaint to add Carrington Mortgage Servicing LLC as a party and add claims against Carrington by March 19, 2025.
 - 2. Currently pending before the Court is HUD's motion to dismiss. (ECF No. 3).
- 3. Samsara filed an opposition to HUD's motion to dismiss, and a countermotion for leave to amend its complaint, on February 20, 2025. (ECF Nos. 18–19).
- 4. HUD's deadline to file its reply in support of its motion to dismiss is due March 7, 2025, as previously stipulated by the Parties. (ECF No. 14). HUD's deadline to file a response to Samsara's motion for leave to amend its complaint is due March 6, 2025. (ECF No. 19).

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- 5. Because the Parties have reached a settlement in principle, the Parties anticipate that HUD's foregoing deadlines will be rendered moot. As such, the Parties agree that HUD's deadlines to file any responses to ECF Nos. 18–19 shall be stayed.
- 6. Based on the above, the Parties respectfully request that the Court set a date in 60 days from any order granting this Stipulation, by which the Parties shall file either (i) a stipulation to dismiss HUD from this action, each party to bear its own attorney's fees and costs, or (ii) a joint status report concerning the matter.

Respectfully submitted this 26th day of February 2025.

SUE FAHAMI Acting United States Attorney HANKS LAW GROUP

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/s/ Reem Blaik/s/ Karen L. HanksREEM BLAIKKAREN L. HANKSAssistant United States AttorneyAttorneyAttorneys for Federal DefendantAttorneys for Plaintiff

IT IS SO ORDERED.

DATE: February 26, 2025

UNITED STATES DISTRICT JUDGE

Cellus C. Mahan

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